

Message

From: Nguyen, Thuy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FDF4C9A977D4493E948C607108A47C0E-THUY NGUYEN]
Sent: 1/4/2021 10:08:50 PM
To: Qian, Yaorong (qian.yaorong@epa.gov) [qian.yaorong@epa.gov]
Subject: FW: Check-in on Anvil

FYI

From: Goodis, Michael <Goodis.Michael@epa.gov>
Sent: Monday, January 4, 2021 3:27 PM
To: Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Cc: Messina, Edward <Messina.Edward@epa.gov>
Subject: RE: Check-in on Anvil

FYI - the following is some additional information of interest from RD/CITAB:

We do commonly see the use of FLPE (fluorinated high-density polyethylene) containers [and much less commonly FLPP (fluorinated polypropylene) containers] in pesticide product storage stability/corrosion characteristics studies. [FLPE is approved by FDA as an indirect food additive (use in food/beverage containers) under 21 CFR 177.1520.] Our storage stability/corrosion characteristics study data requirements do not include a registrant needing to provide any specific information regarding the manufacturing process of the container or any chemical analysis of the container or possible impurities thereof.

<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=177.1615>

TITLE 21--FOOD AND
DRUGS
CHAPTER I--FOOD AND DRUG ADMINISTRATION
DEPARTMENT OF HEALTH AND HUMAN
SERVICES
SUBCHAPTER B - FOOD FOR HUMAN CONSUMPTION
(CONTINUED)

PART 177 -- INDIRECT FOOD ADDITIVES: POLYMERS

Subpart B - Substances for Use as Basic Components of Single and Repeated Use Food Contact Surfaces

Sec. 177.1615 Polyethylene, fluorinated.

Fluorinated polyethylene, identified in paragraph (a) of this section, may be safely used as food-contact articles in accordance with the following prescribed conditions:

(a) Fluorinated polyethylene food-contact articles are produced by modifying the surface of polyethylene articles through action of fluorine gas in combination with gaseous nitrogen as an inert diluent. Such modification affects only the surface of the polymer, leaving the interior unchanged. Fluorinated polyethylene articles are manufactured from basic resins containing not less than 85 weight-percent of polymer units derived from ethylene and identified in § 177.1520 (a) (2) and (3) (i).

(b) Fluorinated polyethylene articles conform to the specifications and use limitations of § 177.1520(c), items 2.1 and 3.1.

(c) The finished food-contact article, when extracted with the solvent or solvents characterizing the type of food and under conditions of time and temperature characterizing the conditions of its intended use as determined from tables 1 and 2 of § 176.170(c) of this chapter, yields fluoride ion not to exceed 5 parts per million calculated on the basis of the volume of food held by the food-contact article.

[48 FR 39057, Aug. 29, 1983]

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Washington, D.C.
571-309-5497 (cell)

From: Nguyen, Thuy <Nguyen.Thuy@epa.gov>
Sent: Monday, January 04, 2021 1:16 PM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Subject: RE: Check-in on Anvil

Preliminary results – based on visual observation

1. Unused and coated drums - Since the drums are not stored in the lab area, we could not rinse the outside of the drums and properly collect the rinsates without spilling solvents on the floor (safety violation). Therefore, we only rinsed the inside. Preliminary data show high level of PFAS in the rinsates of the inside of the drums.
2. Unused and non coated 2.5 gallon jug – Chromatograms look clean, with no detectable level of PFAS

We are working up the numbers now, and hopefully will have them ready tomorrow

Thuy

From: Nguyen, Thuy
Sent: Monday, January 4, 2021 9:21 AM
To: Goodis, Michael <Goodis.Michael@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>
Subject: RE: Check-in on Anvil

Last Thursday (12/31/2020), we prepped and put on the instrument samples of the rinsates for the unused/coated 50 and 30-gallon drums, and of the unused/non-coated 2.5 gallon jug. We are looking at the data now. I will send an update at end of day today or early tomorrow morning at the latest.

Thuy
Happy New Year

From: Goodis, Michael <Goodis.Michael@epa.gov>

Sent: Monday, January 4, 2021 8:46 AM

To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>

Subject: RE: Check-in on Anvil

For the check-in tomorrow, what do you think you will have ready to report out from the lab?
Just want to try and set expectations with Alex.

Michael L. Goodis, P.E.
Acting Deputy Director for Programs
Office of Pesticide Programs
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-----Original Appointment-----

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Tuesday, December 29, 2020 9:20 PM

To: Dunn, Alexandra; Fischer, David; Dekleva, Lynn; Messina, Edward; Rodman, Sonja; Garvey, Mark; Keigwin, Richard

Cc: Bolen, Derrick; Mills, Madeline; Goodis, Michael; Nesci, Kimberly; Anderson, Neil; Nguyen, Thuy; Echeverria, Marietta; Aubee, Catherine; Kaczmarek, Chris; Lowit, Anna; Dennis, Allison; Siedschlag, Gregory; Overbey, Dian; Henry, Tala; Miles, James; Teter, Royan; Charlton, Tom; Ozmen, Shamus; Lara, Rhina; Schwarz, Stephanie

Subject: Check-in on Anvil

When: Tuesday, January 05, 2021 9:30 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

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